08/28/2019 7:57:47 AM -0500 IRS

PAGE 2 OF 3

Form 13449 (May 2015)	Agreement to Assessment and Collection of Penalties Under 31 USC 5321(a)(5) and 5321(a)(6)			
Name of account hold	er			•
nan Reyes	r (SSN) or Employer identification	n number (FIN)	· · · · · · · · · · · · · · · · · · ·	
ocal securay number	(Seek) or Employer identificand	i rumour (Livy		
	ider (Number, Street, City or Town,	Stele, ZII ² code)	<u> </u>	
	FOREST HILLS, NY 11375-5142			
efinition of Penal				
foreign account of CFR sections 1010.	n FinCEN Report 114, Report 6 ,350, 1810.420 and 1810.820(g)		edonnes (t. phys.) o 1 o	SO DOCTORING STATE OF
foreign account of CFR sections 1010	n FinCEN Report 114, Report 6 .350, 1010.420 and 1010.820(g)		ccount (LDWV): 31 or	ents and/or report a: SC 5321(a)(5) and 31
		nd 31 CFR sections 1010.350 and		
. Negägent Failure i	to Meet Recordkeeping Requi	rements: 31 USC 5821(a)(6) and	31 CFR sections 1010.4	20 and 1010,820(h)
. Pattern of Neglige	nt Activity: 31 USC section 532	21(a)(6)(B)		
OTAL proposed pen	alty (from Page 2 of 2)		\$ 420051	
Ignature Authoriz		77		
~		of the penalty amount specifiedat	ove plus any interest a	ki penalty as provided
y law.	,		·	Date signed
our signature		111/9/20		
X	, ide	Date signed		
rebresentance e eithe	ature (valid only with Power of Alter	ing Burnical		
lame of entity for con	poratione, perimerahips, trusta, etc.,	when ElN specified above)	, , , , , , , , , , , , , , , , , , , 	<u></u>
agnature of authorize	d officer	Tible		Data signed
Signature of euthorize	d officer	Title		Date signed
lame of examiner		Employee ID number		Dute (mmddyyyy)
Krista Groen				
Affice of examiner Tampa, FL				
Indu Subbiah	Andr Sukhah	Employee ID number 1000220169		Date (mmotryyyy) 10/9/2019
of supervisor Washington	, DC		Exhibit	44-4 Janes 11-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1
	1			
atalog Number 36612U		www.tra.gov	Fo	m 13449 (Rev. 5-201

Foreign Account Pe	enalty Information			
Name of account holder		Account holder ID (EIN or SSN)		
Juan Reyes		0937		
Foreign Account 1				
Calendar year	Foreign Bank, Institution, or Agent(s)	Proposed penalty per "Definition of Penalty		
2010	Lloyds TSB Bank	Statutes" (Check applicable box(es)) X (1) (2) (3) (4) (5)		
Maximum value of account	Foreign account number(s)	Amount of penalty		
\$ 2161500		\$ 140017		
Foreign Account 2		- A STATE OF THE S		
Calendar year	Foreign Bank, Institution, or Agent(s) Lloyds TSB Bank	Proposed penalty per "Definition of Penalty Statutes" (Check applicable box(es))		
		X (1) (2) (3) (4) (5)		
Maximum value of account	Foreign account number(s) 50	Amount of penalty		
\$ 2113813	_	\$ 140017		
Foreign Account 3				
Calendar year	Foreign Bank, Institution, or Agent(s)	Proposed penalty per "Definition of Penalty		
2012	Lloyds TSB Bank	Statutes" (Check applicable box(es)) X (1) (2) (3) (4) (5)		
Maximum value of account	Foreign account number(s)	Amount of penalty		
\$ 2113485	250	\$ 140017		
	TOTAL proposed penalty (Enter here an	rd on Pago 1 of 2) \$ 420051		

4070070040 40.07DM 70MT 01.001